

RE: DOROTHY J KNIGHT

) Case No. 19 B 13496  
)  
Debtor ) Chapter 13  
)  
) Judge: CAROL A DOYLE

**NOTICE OF MOTION**

DOROTHY J KNIGHT

27 N LATROBE AVE #2  
CHICAGO, IL 60644

DAVID M SIEGEL

via Clerk's ECF noticing procedures

Please take notice that on September 10, 2019 at 10:30 am my designee or I will appear before the Honorable Judge CAROL A DOYLE at 219 South Dearborn Courtroom 742, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL 60603 or by the methods indicated on August 21, 2019.

/s/ Tom Vaughn

**TRUSTEE'S MOTION TO DISMISS FOR UNREASONABLE DELAY**

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On May 09, 2019 the Debtor filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. That the above-captioned plan has not yet been confirmed.
3. That the Debtor has caused unreasonable delay that is prejudicial to creditors by failing to:

Amend Plan (#2) Part 3 to include the PIN number for the property in the description field for all claims securing the interest of a claim for the creditor Cook County and Part 4 to include an allotment for priority claims. Amend the Statement of Financial Affairs to provide Debtor's correct income.

WHEREFORE, the Trustee prays that this case be dismissed for unreasonable delay by the debtor pursuant to 11 U.S.C. § 1307 (c) (1).

Respectfully submitted,  
/s/ Tom Vaughn

TOM VAUGHN  
CHAPTER 13 TRUSTEE  
55 E. Monroe Street, Suite 3850  
Chicago, IL 60603  
(312) 294-5900